

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

	-----X	
	:	
In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13- 53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
	-----X	

**STIPULATION BETWEEN THE CITY OF DETROIT AND
SYNCORA GUARANTEE INC. REGARDING DOCUMENTS
TO BE PRODUCED BY THE DETROIT FIRE DEPARTMENT**

Syncora Guarantee Inc. and the City stipulate and agree that the City will not be required to perform a full search of all electronically stored information of the Detroit Fire Department (“DFD”), but instead will produce the following DFD documents for the period from January 1, 2013 through April 16, 2014:

1. Documents showing each of the classes of new recruits that started at the Fire Academy
2. Documents showing each of the classes of new recruits that started at the EMS Academy
3. Report showing all new hires by the Fire Department and EMS
4. Documents regarding the number of applications submitted by prospective employees (both Fire and EMS), including the number of applicants for each position
5. Documents showing the city and state of residence of job applicants
6. Documents showing the level of educational attainment of job applicants, by position

7. Documents regarding the winter 2014 job fair held at Cobo Hall, in which the Fire Department participated
8. Documents relating to opportunities for promotion within the Fire Department
9. Report showing all separations (including retirement, voluntary and involuntary separations)
10. Retirement requests by employees
11. Notices of employee resignations
12. Documents tracking grievances filed by employees
13. Reports showing response times for both Fire and EMS, including changes in those response times
14. Statistics on the number of calls responded to by Fire and EMS
15. Reports/memoranda addressing equipment, fleet and manpower needs, including memoranda prepared in conjunction with consultants from Conway MacKenzie
16. The “Timeline for Improvement of EMS”
17. Documents relied on in creating the Timeline for Improvement of EMS

Respectfully submitted,

Dated: June 20, 2014

/s/ Deborah Kovsky-Apap
Robert S. Hertzberg (P30261)
Deborah Kovsky-Apap (P68258)
PEPPER HAMILTON LLP
4000 Town Center, Suite 1800
Southfield, MI 48075
Telephone: (248) 359-7300
Facsimile: (248) 359-7700
hertzberg@pepperlaw.com
kovskyd@pepperlaw.com

-and-

Thomas F. Cullen, Jr. (DC 224733)
Gregory M. Shumaker (DC 416537)
Geoffrey S. Stewart (DC 287979)
JONES DAY
51 Louisiana Ave., N.W.
Washington, D.C. 20001
Telephone: (202) 879-3939
Facsimile: (202) 626-1700
tfcullen@jonesday.com
gshumaker@jonesday.com
gstewart@jonesday.com

ATTORNEYS FOR PLAINTIFF CITY
OF DETROIT

/s/ William E. Arnault
James H.M. Sprayregen, P.C.
Ryan Blaine Bennett
Stephen C. Hackney
William E. Arnault
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

- and -

Stephen M. Gross
David A. Agay
Joshua Gadharf
MCDONALD HOPKINS PLC
39533 Woodward Avenue
Bloomfield Hills, MI 48304
Telephone: (248) 646-5070
Facsimile: (248) 646-5075

ATTORNEYS FOR DEFENDANT
SYNCORA GUARANTEE INC.